

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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JENNY RUBIN,
DEBORAH RUBIN,
DANIEL MILLER,
ABRAHAM MENDELSON
STUART HERSH,
RENAY FRYM,
NOAM ROZENMAN,
ELENA ROZENMAN
and TZVI ROZENMAN,

Case No: 11-mc-00039-P1

NOTICE OF
PETITION FOR TURNOVER

Petitioners/Judgment-Creditors,

- against –

HAMAS - ISLAMIC RESISTANCE MOVEMENT
(a.k.a. “Harakat Al-Muqawama Al- Islamiyya”),

Judgment-Debtor,

-and-

JP MORGAN CHASE BANK, N.A.,
HSBC BANK, U.S.A., N.A.,
CITIBANK, N.A.,
and MORGAN STANLEY DW, INC.,

Respondents /Garnishees.

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PLEASE TAKE NOTICE that upon the annexed Petition for Turnover and upon the pleadings and proceedings heretofore had herein, Petitioners/Judgment Creditors Jenny Rubin, Deborah Rubin, Daniel Miller, Abraham Mendelson, Stuart Hersh, Renay Frym, Noam Rozenman, Elena Rozenman and Tzvi Rozenman hereby move this Court for an Order:

- a) PURSUANT to Fed.R.Civ.P. 69, New York CPLR §§ 5225 and 5227, and § 201 of TRIA, directing the Respondents-Garnishees to turn over to the Petitioner/Judgment-Creditors, by delivery to their counsel Robert J. Tolchin, Esq., all blocked assets of the Holy Land Foundation for Relief and Development in the possession of Respondents-Garnishees; and
- b) GRANTING such other and further relief as is just and proper under the circumstances.

Dated: New York, New York
September 16, 2011

Yours,

THE BERKMAN LAW OFFICE, LLC
Attorneys for the Petitioners / Judgment-Creditors

by: /s/ Robert J. Tolchin
Robert J. Tolchin

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